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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SENECA A. DURR,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01907-APG-PAL

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REMAND**

(Third Request)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to file her response to Plaintiff's Motion for Reversal/Remand be extended from April 30, 2019 to **May 9, 2019**. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Counsel had multiple family deaths and was out on leave attending funeral and prayer services. In addition, Counsel has been out of the office due to her ongoing chronic migraines, which impair her vision. Counsel also has over 100+ active social security matters that require two or more dispositive motions per week until mid-July. Due to unexpected leave, Counsel respectfully requests additional time to adequately review the transcript and respond to

1 the issues raised in Plaintiff's Motion. Defendant makes this request in good faith with no intention to
2 unduly delay the proceedings. Defendant apologizes for the belated request for extension, but filed an
3 extension of time as soon as reasonably practicable following her sick leave. The parties further
4 stipulate that the Court's Scheduling Order shall be modified accordingly.
5

6 Respectfully submitted,

7 Dated: April 30, 2019

/s/ Joshua Harris
(*as authorized by email on April 30, 2019)
JOSHUA HARRIS
Attorney for Plaintiff

11 Dated: April 30, 2019

NICHOLAS A. TRUTANICH
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

15 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

18 **ORDER**

19 APPROVED AND SO ORDERED:

20 DATED: May 2, 2019


THE HONORABLE PEGGY A. LEEEN
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, TINA L. NAICKER, certify that the following individual was served with a copy of the **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR REMAND** on the date and via the method of service identified below:

CM/ECF:

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Attorneys for Plaintiff

Respectfully submitted this 30th day of April 2019,

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney